

Webinar and Q&A
with Paul Muir

Get ready for RG
271 – Final checklist
& practical tips to
be ready by 5th Oct



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Tuesday | 21st September | 12-1pm

Agenda

01 Quick recap of your duties & changes

02 Process readiness checklist

03 People training checklist

04 Using tech to get ready

05 Tips and Q&A

Three main steps to successful transition to the new regime



People

- Your people understand and support your philosophy, duties and know how to navigate the process

Process & Technology

- Clear process within your organization and agreements with other organizations

Understanding

- Your understanding of your duties and responsibilities



**RECAP OF
YOUR DUTIES**

The new complaint process has broader complaint definitions and stricter rules that form your obligations



1

Identify & record a complaint

- Broader definition of a complaint with mandated information to be collected
- Make sure that the complaint process is easy, accessible & free

2

Identify vulnerability & triage

- Initial identification of vulnerability is crucial and required by GICOP
- Once identified, the complaint must be triaged & handled with a higher priority

3

Confirm the receipt to the complainant

- The regulation requires a confirmation via complainants preferred channel and mandates specific information requirements
- The recommended timeline is 24 hours from the receipt of the complaint

4

Inform the insurer within 2 business days (not applicable for insurers)

- All entities that work with or on behalf of insurers must inform the insurers of every new complaint within 2 business days (GICOP requirement)

5

Triage & resolve within max 30 days

- The overall expectation is to resolve the complaint ASAP
- Specific rules for complaints resolved within 5 business days
- Maximum resolution timeline is 30 days with specified exceptions for delays

6

Keep the records & refer (e.g. to AFCA) if necessary





- ASIC has created a Data Dictionary that is planned to be implemented as an obligation (not yet), however a certain set of records must be kept (e.g. written confirmation that the complainant is satisfied with the outcome of the complaint)



PROCESS READINESS CHECKLIST





Process readiness checklist (1/2)

How far are you in amending your process?

- **How easy it is to find the complaints process and make a complaint with your company?** – e.g., is it easy to find on your website? Is the process clear and visible? Have you made sure that people with disabilities can access the process? 
- **Have you thought through the process of collecting the additional information required by ASIC?** – e.g., do you have a form with specified questions or is it just an email? 
- **Have you updated your privacy policy to reflect additional info required by ASIC (e.g., gender, age, postcode)?** – e.g., if your privacy policy specifies the data fields you are collecting, you might want to update those. 
- **Have you agreed on the complaint handling process and spoken through different scenarios with your partners?** – e.g., if you receive a complaint about an insurer – how will you transfer it? Did you agree on the timelines? Once the complaint is transferred, how will you make sure that it is handled properly / in line with your expectations as AFSL holder? 

Technical and process readiness checklist (2/2)

How far are you in amending your process?

- **Have you designed a way to oversee the complaints portfolio & manage it proactively?** – e.g., knowing how many complaints you are receiving, most frequent issues raised, stage and handling party of every complaint, urgent / escalating issues etc. 
- **Have you integrated your complaints management with the overall risk & compliance framework?** – e.g., designed a mechanism to identify systemic issues and resolve them, monitor workload of your front staff and make sure that they have enough time to deal with complaints on time etc. 
- **Have you designed / thought through the physical file transfers between different parties?** - e.g., can you download all relevant documents & complaint info? Can you mark certain documents as complaint-related? How much time would it take to go through the whole file? 
- **Have you thought about “alerts” and escalation triggers?** – e.g., if a complaint includes a vulnerable party, if the resolution is taking longer than expected and about to breach your SLA or ASIC requirements? 



**PEOPLE
TRAINING
READINESS
CHECKLIST**

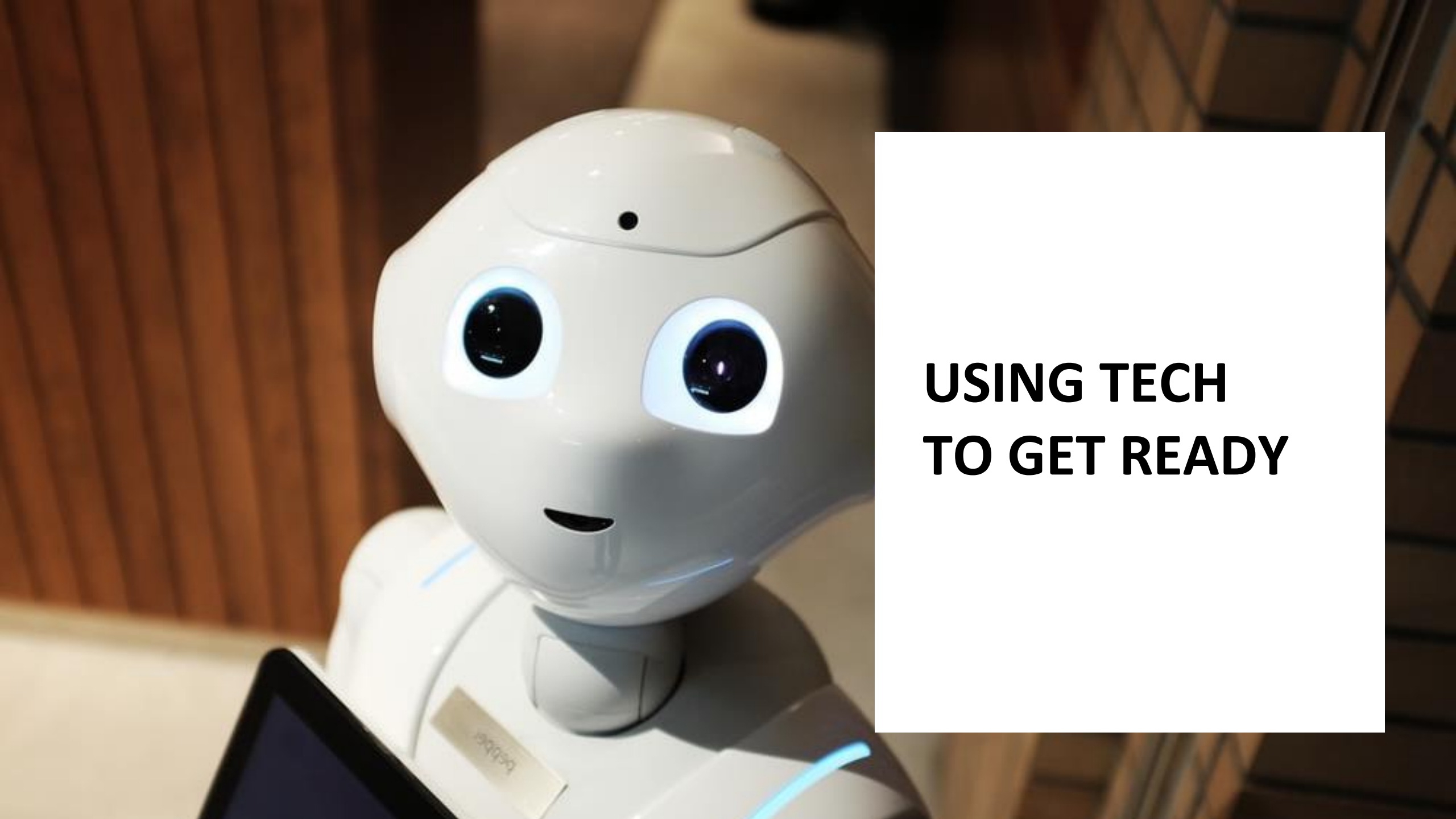
Training readiness checklist – how far are you in preparing your people?

- Triage**
Have you named & trained a person(s) dedicated to all incoming complaints?
- Definition of complaint**
Have you given enough examples / training to your staff to correctly identify a complaint?
- Complaint against you vs. others**
Have you thought through case studies and process for different types of complaints / parties involved?



Front line staff
Have you run trainings with your front line staff to identify and deal with complaints?

Other staff
Have you trained the staff to deal with e.g. systemic issues, vulnerabilities, IT issues etc?



USING TECH TO GET READY

Curium is a simple and smart Complaints solution...



1

Pre-configured with RG 271 & GICOP requirements

Out-of-the-box configuration of ASIC data dictionary, enforceable paragraphs of RG 271 and relevant GICOP regulation

2

Platform that enables you to hand over and collaborate on each complaint

Allow full access to any partner organization and work on matters together while having one accountable owner.

3

Flexible to meet your business requirements

Decide how you want Curium to reflect your SLAs, workflows and partner organizations with a simple no-code configuration

...with the easiest and the most affordable commercial terms



48h

From sign-up to
Go Live

- Free 1 month trial
- Zero upfront cost
- Pay-as-you-go
- Unlimited number of users, incl. external parties
- Advanced information security protocols
- Easy sign-up process

TIPS AND Q&A



As AFSL holder, do not forget the following



Alerts

- You can receive complaints about your business directly or via your partners. Therefore, the onus is on you to make sure that you have a good system of alerts & action plan in place.



Outsourcing

- You might be managing a complaint against another organization, however if this organization has outsourced the management to you (e.g., TPAs managing complains against insurers), that organization is still accountable



Conflict of interests

- If a complaint is made against your organization, you need to make sure that you have a protocol of managing conflict of interest in place – e.g., independent board, a partner organization to ensure independence



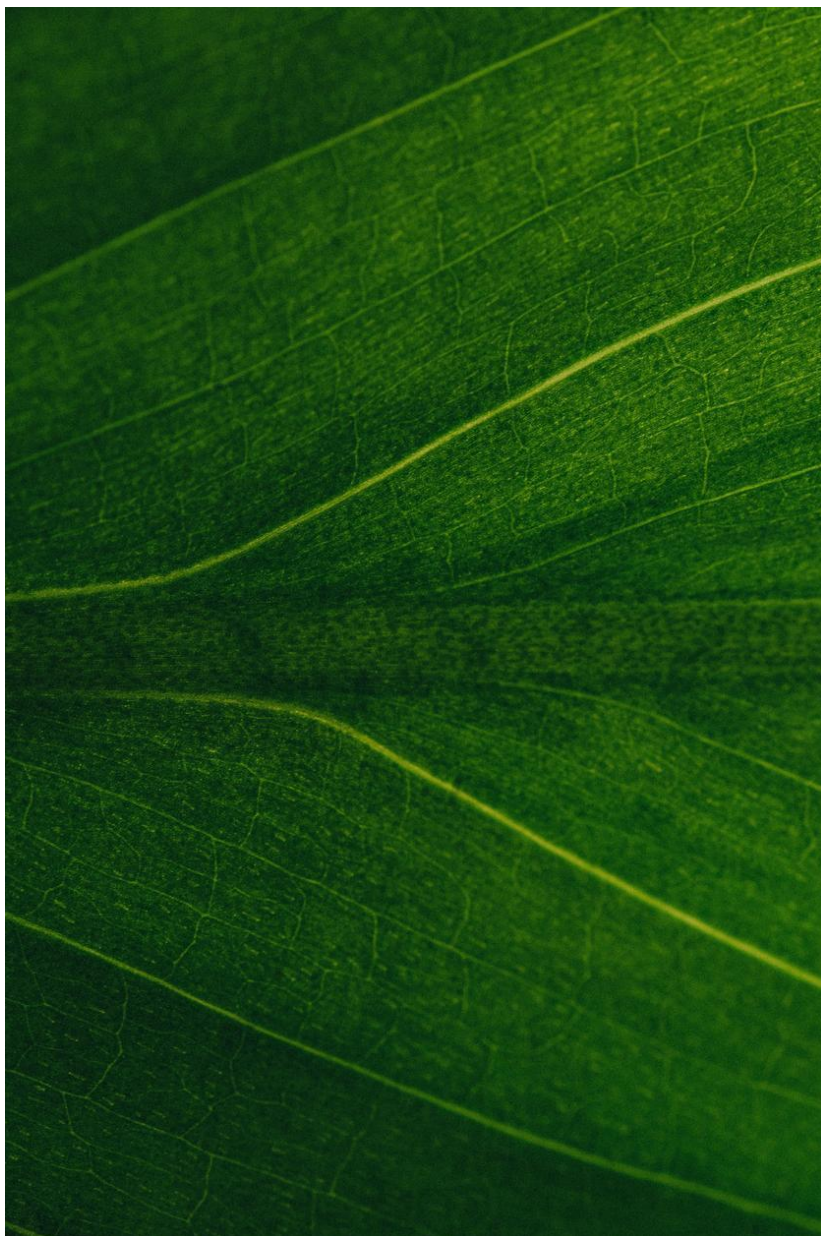
SLA VS. Root Cause

- In situations, where multiple AFSL holders are involved, a typical solution is an SLA (e.g., party 1 needs to handle the complaint within 15 days and move it to party 2 if it hasn't been resolved). However, a better practice is to identify who the complaint is made against/who is the right party to manage it and notify that party asap (not waiting for the SLA period to pass).



Your AFSL

- Even if you have handed over a complaint to another party (e.g., insurer), you remain accountable for it in the eyes of the regulator. Thus, you need to make sure that you are aware of how the complaint is being handled and can intervene.



Q&A

1

Q: what if a client is complaining about the claim decision, but is not providing any evidence to support their point? Can I record the complaint only when they provide the evidence?

2

Q: what if my insurer (I am a TPA running claims on their behalf) requires me to move every complaint to them after 15 days? What can I do, if the complaint involves my organization and I want to keep an oversight on the handling after the 15 days?

3

Q: What do I need to do if a broker keeps disputing claims decisions on a regular basis and puts a lot of complaints through?

4

Q: What if I get a complaint that does not relate to my business at all, and relates to a party I am working with?

5

6



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